

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Amy Blalock 1001 Gayley Ave #24381 Los Angeles, CA 90024 310-569-6182 amyblalock@gmail.com	FOR COURT USE ONLY
<input checked="" type="checkbox"/> Respondent appearing without attorney <input type="checkbox"/> Attorney for Respondent:	
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA **SELECT DIVISION**</b>	
In re:  Amy Lynne Blalock         Debtor(s).	CASE NO.: 24-BK12532-BR CHAPTER: 7  <b>RESPONSE TO MOTION REGARDING THE AUTOMATIC STAY AND DECLARATION(S) IN SUPPORT</b>  DATE: 10/08/2024 TIME: 10:00 am COURTROOM: 1668 PLACE: 255 E Temple St Los Angeles, CA 90012
<b>Movant:</b> Stewart Lucas Murrey	

**Respondent:** ☒ Debtor ☐ trustee ☐ other:

**NOTE REGARDING FILING AND SERVICE OF RESPONSE, EXHIBITS AND DECLARATIONS:**

A copy of the Response, exhibit(s) and declaration(s) must be served upon:

- (1) Movant's attorney (or Movant, if Movant does not have an attorney);
- (2) the trustee; and
- (3) the judge who presides over this bankruptcy case.

Then the document must be filed with the court.

1. ☐ **NONOPPOSITION**

The Respondent does not oppose the granting of the Motion.

This form is optional. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

2. ☐ **LIMITED OPPOSITION**

- a. ☐ Respondent opposes the Motion only to the extent that it seeks immediate relief from stay. Respondent requests that no lock out, foreclosure, or repossession take place before (date): \_\_\_\_\_ and the reason for this request is (specify): \_\_\_\_\_
- b. ☐ As set forth in the attached declaration of the Respondent or the Debtor, the motion is opposed only to the extent that it seeks a specific finding that the Debtor was involved in a scheme to hinder, delay or defraud creditors.
- The Debtor:
- (1) ☐ has no knowledge of the Property.
- (2) ☐ has no interest in the Property.
- (3) ☐ has no actual possession of the Property.
- (4) ☐ was not involved in the transfer of the Property.
- c. ☐ Respondent opposes the Motion and will request a continuance of the hearing since there is an application for a loan modification under consideration at this time. Evidence of a pending loan modification is attached as Exhibit \_\_\_\_\_.

3. ☒ **OPPOSITION:** The Respondent opposes granting of the Motion for the reasons set forth below.

- a. ☐ The Motion was not properly served (specify):
- (1) ☐ Not all of the required parties were served.
- (2) ☐ There was insufficient notice of the hearing.
- (3) ☐ An incorrect address for service of the Motion was used for (specify): \_\_\_\_\_
- b. ☒ Respondent disputes the allegations/evidence contained in the Motion and contends as follows:
- (1) ☒ The value of the Property is \$ 0.00, based upon (specify):  
I do not owe the Plaintiff any money, there was never a settlement granted. My bankruptcy has been discharged.
- (2) ☐ Total amount of debt (loans) on the Property is \$ \_\_\_\_\_.
- (3) ☐ More payments have been made to Movant than the Motion accounts for. True and correct copies of canceled checks proving the payments that have been made are attached as Exhibit \_\_\_\_\_.
- (4) ☐ There is a loan modification agreement in effect that lowered the amount of the monthly payments. A true and correct copy of the loan modification agreement is attached as Exhibit \_\_\_\_\_.
- (5) ☐ The Property is necessary for an effective reorganization. Respondent filed or intends to file a plan of reorganization that requires use of the Property. A true and correct copy of the plan is attached as Exhibit \_\_\_\_\_.
- (6) ☐ The Property is fully provided for in the chapter 13 plan and all postpetition plan payments are current. A true and correct copy of the chapter 13 plan is attached as Exhibit \_\_\_\_\_ and proof that the plan payments are current through the chapter 13 trustee is attached as Exhibit \_\_\_\_\_.
- (7) ☐ The Property is insured. Evidence of current insurance is attached as Exhibit \_\_\_\_\_.

- (8) ☐ Movant's description of the status of the unlawful detainer proceeding is not accurate.
- (9) ☐ Respondent denies that this bankruptcy case was filed in bad faith.
- (10) ☐ The Debtor will be prejudiced if the Nonbankruptcy Action is allowed to continue the nonbankruptcy forum.
- (11) ☐ Other (*specify*):

c. ☐ Respondent asserts the following as shown in the declaration(s) filed with this Response:

- (1) ☐ The bankruptcy case was converted from chapter \_\_\_\_ to chapter \_\_\_\_.
- (2) ☐ All postpetition arrearages will be cured by the hearing date on this motion.
- (3) ☐ The Property is fully provided for in the chapter 13 plan and all postpetition plan payments  
☐ are current, or ☐ will be cured by the hearing date on this motion.
- (4) ☐ The Debtor has equity in the Property in the amount of \$ \_\_\_\_\_.
- (5) ☐ Movant has an equity cushion of \$ \_\_\_\_\_ or \_\_\_\_\_% which is sufficient to provide adequate protection.
- (6) ☐ The Property is necessary for an effective reorganization because (*specify*):
- (7) ☐ The motion should be denied because (*specify*):
- (8) ☐ An optional memorandum of points and authorities is attached in support of this Response.

**4. EVIDENCE TO AUTHENTICATE EXHIBITS AND TO SUPPORT FACTS INSERTED IN THE RESPONSE:**

Attached are the following documents in support of this Response:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Declaration by the Debtor | <input type="checkbox"/> Declaration by the Debtor's attorney |
| <input type="checkbox"/> Declaration by trustee               | <input type="checkbox"/> Declaration by trustee's attorney    |
| <input type="checkbox"/> Declaration by appraiser             | <input type="checkbox"/> Other ( <i>specify</i> ):            |

Date: 09/17/2024

\_\_\_\_\_  
Printed name of law firm for Respondent (if applicable)

Amy Blalock

\_\_\_\_\_  
Printed name of individual Respondent or attorney for Respondent

  
\_\_\_\_\_  
Signature of individual Respondent or attorney for Respondent

This form is optional. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

**DECLARATION OF AMY BLALOCK**

I, AMY BLALOCK, declare as follows in support of my motion:

1. I have personal knowledge of the facts set forth below, and if called upon to testify, I could and would competently testify thereto.

2. The value of the property is \$0.00, based upon I do not owe the Plaintiff any money, there was never a settlement granted. My bankruptcy has been discharged.

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2 I declare under penalty perjury that the foregoing facts are known to me to be true and correct to the  
3 best of my knowledge.

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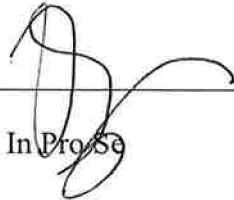
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6 Executed at:

7 Woodland Hills

8 1104 E. Cherry Chase  
9 Glendale, CA 91205

10 Dated: 9/18/24

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12 Debtor In Pro Se  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

1104 E. CHERRY CHASE  
GLENDALE, CA 91205

A true and correct copy of the foregoing document entitled: **RESPONSE TO MOTION REGARDING THE AUTOMATIC STAY AND DECLARATION(S) IN SUPPORT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 9/19/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) 9/19/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Stewart Lucas Murrey  
1217 Wilshire Blvd #3655  
Santa Monica, CA 90403

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

9/19/2024  
Date

Emily Thompson  
Printed Name

[Signature]  
Signature

In re:  
Amy Lynne Blalock  
Debtor

Case No. 24-12532-BR  
Chapter 7

## CERTIFICATE OF NOTICE

District/off: 0973-2  
Date Rcvd: Aug 20, 2024

User: admin  
Form ID: not

Page 1 of 2  
Total Noticed: 19

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
^	Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 22, 2024:

Recip ID	Recipient Name and Address
db	+ Amy Lynne Blalock, 1619 N La Brea Ave #509, Los Angeles, CA 90028-6476
41915162	+ Cedars Sinai, PO Box 48954, Los Angeles, CA 90048-0954
41915163	+ Cedars Sinai, 1801 West Olympic Blvd, Pasadena, CA 91199-0001
41915164	+ Cedars Sinai, 8700 Beverly Blvd, Los Angeles, CA 90048-1865
41915174	+ Stewart Lucas Murrey, 1217 Wilshire Blvd. # 3655, Santa Monica, CA 90403-5466

TOTAL: 5

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
smg	Email/Text: itcdbg@edd.ca.gov	Aug 20 2024 23:37:00	Employment Development Dept., Bankruptcy Group MIC 92E, P.O. Box 826880, Sacramento, CA 94280-0001
smg	Email/Text: BKBNCNotices@ftb.ca.gov	Aug 20 2024 23:37:00	Franchise Tax Board, Bankruptcy Section MS: A-340, P.O. Box 2952, Sacramento, CA 95812-2952
smg	Email/Text: finance.bankruptcy@lacity.org	Aug 20 2024 23:36:00	Los Angeles City Clerk, P.O. Box 53200, Los Angeles, CA 90053-0200
41915160	+ Email/Text: GSBankElectronicBankruptcyNotice@gs.com	Aug 20 2024 23:36:00	Apple Card - GS Bank USA, Lockbox 6112 PO Box 7247, Philadelphia, PA 19170-0001
41915161	+ Email/PDF: AIS.cocard.cbn@aisinfo.com	Aug 20 2024 23:40:47	Capital One, PO Box 31293, Salt Lake City, UT 84131-0293
41915165	+ Email/PDF: creditoncbknotifications@rcsurgent.com	Aug 20 2024 23:40:11	Credit One Bank, 6801 S. Cimarron Road, Las Vegas, NV 89113-2273
41915167	Email/Text: mrdiscen@discover.com	Aug 20 2024 23:36:00	Discover Bank, PO Box 15316, Wilmington, DE 19850
41915166	+ Email/Text: support@drsi360.com	Aug 20 2024 23:36:00	Designed Receivable Solutions, Inc., 10833 Valley View St Suite 415, Cypress, CA 90630-5051
41915168	+ Email/Text: EBN@edfinancial.com	Aug 20 2024 23:36:00	Ed Financial/ESA, 120 N Seven Oaks Dr, Knoxville, TN 37922-2359
41915169	+ Email/Text: Legal@bankeasy.com	Aug 20 2024 23:37:00	FB&T/Mercury, 700 22nd Ave South, Brookings, SD 57006-2822
41915171	+ Email/Text: sbse.cio.bnc.mail@irs.gov	Aug 20 2024 23:37:00	Internal Revenue Service, P.O. Box 7317, Philadelphia, PA 19101-7317
41915172	^ MEBN	Aug 20 2024 23:32:13	Prosper Marketplace Inc., 221 Main St Suite 300, San Francisco, CA 94105-1909
41915173	+ Email/Text: BankruptcyMail@questdiagnostics.com	Aug 20 2024 23:37:00	Quest Diagnostics, PO Box 740987, Cincinnati, OH 45274-0987
41915175	+ Email/Text: bkcelectronicnoticcs@usaa.com		

District/off: 0973-2

User: admin

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Date Rcvd: Aug 20, 2024

Form ID: not

Total Noticed: 19

Aug 20 2024 23:36:00

USAA Federal Savings Bank, PO Box 33009, San Antonio, TX 78265-3009

TOTAL: 14

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
41915170		Foresight Mental Health

TOTAL: 1 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

I, **Gustava Winters**, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309):** Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 22, 2024

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 20, 2024 at the address(es) listed below:

Name	Email Address
Howard M Ehrenberg (TR)	chrenbergtrustee@gmlaw.com ca25@ccfcbis.com;C123@ccfcbis.com;howard.chrenberg@ccf.courtdrive.com;Karcn.Filcs@gmlaw.com
Karine Karadjian	on behalf of Debtor Amy Lynne Blalock karine@kclawfirm.com karine.karadjian@gmail.com;karadjiankr95745@notify.bestcase.com
United States Trustee (LA)	ustpreion16.la.ecf@usdoj.gov

TOTAL: 3